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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

**16-CV-1067 RSM-JPD**

ESSIE LEE SLAUGHTER,  
(Name of Plaintiff)

vs.

CIVIL RIGHTS COMPLAINT  
BY A PRISONER UNDER 42  
U.S.C. § 1983

Super.-Dan White, Assoc. Super.-  
Jack Warner, Timothy C. Chase,  
Assoc. Super.-Michelle Wood, Super.-  
Erik Jackson, Super.-Michael Oberland,

(Names of Defendant(s))

I. Previous Lawsuits:

A. Have you brought any other lawsuits in any federal court in the United States while a prisoner?:

Yes       No

B. If your answer to A is yes, how many: 5. Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff: Essie L. Slaughter

#17  
Defendants: Pat Glebe, Stephane Sinclair, Super.-Erik  
Jackson, Reed Holtgeerts, etc..

2. Court (give name of District): U.S. (western) Dist, U.S. Eastern District  
3. Docket Number: CIS-5484-BTS-JRC, can't remember the rest  
4. Name of judge to whom case was assigned: M.J. Benton, SuKo, Batt. Seattle, etc..  
5. Disposition (For example: Was the case dismissed as frivolous or for failure to state a claim? Was it appealed? Is it still pending?):  
One's pending, the others were dismissed Failure to state a claim, etc..  
6. Approximate date of filing lawsuit: Not exactly sure, the one pending is (7, 2015)  
7. Approximate date of disposition: Not sure -?

II. Place of Present Confinement: Washington State Penitentiary

A. Is there a prisoner grievance procedure available at this institution?  Yes  No

B. Have you filed any grievances concerning the facts relating to this complaint?

Yes  No

If your answer is NO, explain why not:

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C. Is the grievance process completed?

Yes &  No  
The above defendants confiscated them!

If your answer is YES, ATTACH A COPY OF THE FINAL GRIEVANCE RESOLUTION for any grievance concerning facts relating to this case.

III. Parties to this Complaint

A. Name of Plaintiff: Ossie L. Slaughter Inmate No.: 827869  
Address: 1313 N. 18<sup>th</sup> Ave., Walla Walla, WA 99362

(In Item B below, place the full name of the defendant, his/her official position, and his/her place of employment. Use item C for the names, positions and places of employment of any additional defendants. Attach additional sheets if necessary.)

#18  
B. Defendant: Super. Dan White Official Position: Superintendent  
Place of employment: Monroe Correctional Complex (socu)

C. Additional defendants Michael J. Clayton, Tanya L. Browne, Kathryn M. Grey, Aaron Heineman, Harold P. Archibald, Lisa L. Anderson, C. U.S. Jason Neely, Lt. T. Asens, Brittany West, C/O Jason Rogers, Sgt. C. M. Laughlin, Lt. T. Katrina Jackson, S/o Blackmar, S/o Went, Sgt. - Mackwood, Sgt. - Avala, S/o Jones, C/o Stringham, S/o Johnson, P.A. Shirley, Lee Stemper, Dale Coldwell, (sow) Property Officer - John Doe?, Mental Health counselor - Kate Bright, TRU Property Officer - Tammy?

IV. Statement of Claim The Above Defendants acted under the color of law, and in their individual and official capacity Pg. (1 of 21)

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates, places, and other persons involved. Do not give any legal arguments or cite any cases or statutes. If you allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets if necessary.)

#4  
en, 4-4-16, I was transferred to Monroe Correctional Complex (Special Offenders Unit) and housed in F-unit. By orders mental health staff - Dr. Stokes, Dr. Quiggle, and Headquarters Staff, in Olympia, WA. of WDOC & to be evaluated and treated for mental health disabilities. Subsequently, I was apprised by my then Mental Health Counselor - Brittany West, "you need to sign the (soc) consent for Evaluation and treatment form, before I can treat or evaluate you," etc.. She never stated that I had to sign that form when I asked her, is it required for me to sign that form, or will it cause me to get into any trouble, as I'm in fear of signing that form, until I can understand what will happen to me if I do sign it, etc.. As Mt. counselor - B. West, refused to be of any availing conductiveness, and became inimical and angry with me, as I tried to explain, "I have trust issues with WDOC staff, because all kinds of stories, embellished, false reports and infractions they have written or orally stated about me, to sabotage and discredit my active and prior filed Civil complaint and grievance complaints, etc.. I have submitted against them and their supervisory superiors," etc.. She stated, "you don't have to sign the form and nothing bad will happen to you, you will only receive basic counseling, and just need to participate in the group meetings once a week. You will not be moved out of (sow). I stated, "That was one of my concerns, being moved again and my property being separated from" because I have a active Civil complaint. Then, Mt. - B. West, became more inimical towards and then I started receiving staff misconduct from other F-unit and custody staff, i.e., C/o De Mayo who verbally assaulted me in the day room, who then later told me he looked into me electronic files and seen my history, etc.. I

then was harassed by 90-Kumar, a few times outside F-unit. I then was instructed by F-unit staff 90-Alex, and the relief Sgt. Helgren to "file a grievance against him/90-Kumar." I explained, "I did not want to file a grievance because it would lead to me receiving more staff reprisal and I don't want any trouble", etc.. They both insisted that I file it. When I filed that grievance, and talked to other staff about 90-Kumar, 90-De Mayo's misfeasance behavior, to Lt.-Richards, Sgt.-Clayton, 90-Grant, and mental health F-unit staff ms. B. West, their same behavior continued, now, out of sur-reptitious reprisal. Then Lt.-Richards had me "wait to file my second grievance about the quality and process of the (soe) food being served to me and the (soe) inmates". Then on "6-1-16" which was the date Lt.-Richards instructed me to wait for, to see if the food quality and process of the food would be changed for the better, but it wasn't. I filed that grievance too. Then it was about an incident that included Lt.-Richards and his subordinate staff. Then, I began to receive more reprisal, from F-unit staff, my then Counselor-Aaron Henneman, as he became hysterical, irate, boisterous, verbally assaultive, and in a abrupt, arrogant threatening and/or intimidating posture and tone, as he stood in my face, with his fist clinched in fighting position, as he had a Kanip-ton Fit, because I only asked 90-Ward the Pod-2/F-unit Custody 2nd shift staff, to ask him "could he make legal copies for me today, because I have a court deadline?" As 90-Ward and all the inmate's in the Pod-2 dayroom

I stand and watched this whole incident happen, as counselor-A. J. Heineman, refused to make any legal copies for me; and that "he don't give a sh\*\* + about my court deadline in the dam U.S. District Court. That sh\*\* +, don't scare him"; etc.. Then %o-ward instructed me to "go see the then relief sgt.-?" at sgt.-Clayton's office". which when I attempted to do so counselor-A. Heineman stopped me on the way, even at the entrance to sgt.-Clayton office door entrance, ordering me to come talk to him privately, in a interview room in the corridor, which he poorly attempted to appologize for his misconduct; but never stated, I appologize, only that "my behavior was unacceptable" etc.. However, to make<sup>it so</sup> I wouldn't have to be in fear of another episode, I expressed to that sgt.-? /relief sgt.-?, whom mr. A. Heineman, asked me "not to explain to the Sgt. what he did to me", what counselor-A. Heineman conduct was "like towards me, and that "go-ward and the entire dayroom seen and heard this temper tantrum"; etc.. Then, subsequently go-Lance Rogers, unprovoked, started singling me out every time he seen me, for harassment, racial discrimination, Pat-searching me 7-10 times in less than a two week period. Then when I complained to his supervisory staff Sgt.-Ayala, Sgt.-Packwood, Sgt.-Granger, then L.t.-Richards, L.t.-Asens, F-unit relief sgt.-?, %o-ward, %o-Grant, Sgt.-Clayton, Mental Health Staff-Brittany West, Ms. C, Dr. Abghari, Super.-Dan White. His/Co-L.Rogers behavior of malfeasance, reprisal and racism became more egregious. As, he began stock-

King me, coming to F-unit/Pod-2, where I was housed, with Sgt.- Packwood, Lt.-Asen, etc.. When I tried to avoid eating in the Inmates Kitchen dining room, which was where GO-L. Rogers was assigned to work. Then after I filed grievance's against him, on 5-9-16, he pat-searched me again, with my then M.H.-Counselor - Brittany West standing to my right side. After he pat-searched me, as I only "exasperated and looked to my right at, M.H.-B. West, and immediately complied, when GO-L. Rogers asked me to "stand for search." He then stated, "you can let me have the Ink-pen and allow me to throw it in the trash can or receive an infraction? I agreed to allow him to throw it into the trash can. Which the reason he took my ink-pen was he abstractedly believes there was a dining room rule that stated, "Inmates can not bring Ink-pens into the dining room" when there was no rule in place at that time and date. This misfeasance action was also considered a "on-site" meaning the Officer/staff has the option of either giving a inmate a reprimand/warning at the time of the alleged mis-behavior or infract the inmate. But he/she cannot do both. However, after GO-L. Rogers confiscated and destroyed my Ink-pen based on a fictitious dining room rule; and I then returned to F-unit, H.M.- B. West came right after me to F-unit to see if I was filing a grievance, and when I tried to "speak to her in the interview room, privately about the emotional distress GO-L. Rogers was causing me from holding me to higher standards than

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other (soc) Inmates (300-Inmates), she "refused to talk to me in the interview room", but instead wanted to violate my confidential medical issues in the present of the staff and inmates in the Pod-2 day room. Then as I stated, "I'm going to just file a grievance" on SGT-L. Rogers, she corroborated his malfeasance behavior stating, "he didn't do anything wrong", etc.. Then she went into the Mental Health Office area to apprise SGT-L. Rogers I was filing a grievance against him, then she in cahoots with SGT-Rogers wrote an infraction for a "663-wac rule violation" stating, "I tried to manipulate his supervisor's to stop him from pat-searching me", etc.. With "H.M.-Brittany West" as a "witness", that I "intimidated him, because I only asked him, "why do you keep harassing me, singling me out for 7 or more pat-searches in less than two weeks; and if he held the other (300-Inmates) to the same amount of pat-searches in 2-weeks", etc.. Then he became irate saying, he can search me as many times as he wants, when he wants to, etc., as I ended the dialogue and turned my attention towards the two Sgt's Sgt.-Ayala, and Sgt.-Grainger, who stated, "He can search you when he wants to," when I asked them "can I speak to a Sgt.", etc.. Then I stated, "OK, I'm not going to argue with you. Can I speak to a Lieutenant?" I believe, L.t.-Asens, or, L.t.-Jackson was on duty. Then I was instructed by Sgt.-Grainger to return to the F-unit, and we'll send the Lt. to your unit", etc.. Which I immediately complied. So, I never violated any

rules, especially a(663-wac rule). Then, on 6-10-16, I received a Infraction "663-wac rule violation" written by Yo-L. Rogers, with H.M.-B. West as a witness to the alleged incident. I then spoke to my then new mental health counselor - Dr. Abghari, and showed him the infraction (663-wac rule) and that H.M.-B. West wrote false reports in a paradoxical manner, as she first states, I "complied with the Pat-search, immediately and didn't say a word prior to nor daring that pat-search," etc.. Then she goes on to make fallacious statements "based on her clinical opinion" which I stated, "is illegal and a violation of my confidentiality rights of mental health medical treatment, and that's exactly why I told her I don't trust staff or wdoc, and her, cause I don't know her," etc.. He stated, "I will correct this issue, and talk to the Assoc. Super. - Jack Warner, to clear this matter up, because she cannot make clinical opinions in a infraction, now go to dinner," etc.. Again, as I explained to Dr. Abghari, "I don't want to go to dinner as long as Yo-L. Rogers is at the diningroom, because I fear he's trying to set me up to be sent to I-T.U/A-unit," etc.. Then Mr. Abghari convinced me to go, and Yo-L. Rogers influenced a assisting Yo-? to Pat-Search<sup>me</sup> on my way into the diningroom, who stated to me as I was in line, "A. what's your name?" I stated, "Slaughter, Why?" He stated, "Oh, yeah. Stand for search Slaughter." I immediately complied, was so emotionally distressed, I didn't eat, I then left the dining room and as I exited the dining room, again, Yo-L. Rogers Pat-Searched me, while L.T.

Asens watched him, and I stated, "Excuse me, Lt.- Asens, you going to intervene, like you told me you will do if he holds me to higher standards than the other 300-inmates?" He stated, "He can search you when he wants to." I then returned to my unit-f and wrote another grievance, against them both. Then on 5-12-16, I received a biased Disciplinary Hearing from Hearing OFFices - S. Ewing . who Failed to provide me with the "requested video footage of the alleged incident"; No, did he allow me to "submit questionares to all the staff involved with the alleged incident to the (663-wac rule violation)". He denied my request for a dismissal because I was "on-sited", the video footage was not provided because of a alleged "glitch" he could not explain what a glitch is, and because of the conflicting staff statements, and contradiction him- B. West stated in the begining of her statement which she started corroborating my statements; I "complied with the pat-search without saying a word", therfore only asked a question as I stood "5-ft." away from Lt. Rogers after he finished his pat-search , and that my questionare request was not pro- vided or addressed, etc.. Then Hear.Offc. - S. Ewing called H.m. - B. West then had me placed in wrist restraints and found me guilty based on H.m. - B. West's clinical opinion; and sanctioned me to "20-day Disciplinary Segregation, and 15-days of dayroom restriction." Then I was taken to I.- T.U/A-unit 23-Sometimes 24-hour lockdown. This mal- feasance misconduct by the above defendants was retali-

atory, punitive, deliberate, malicious ill-will, and a nefarious plot and scheme against me. which also was/is cruel and unusual treatment, deliberate indifference to my needs, which violated my Constitutional protected rights and conduct to the 1st, 4th, 5th, 8th, and 14th Amendments. The defendants misbehavior violated my rights to a liberty interest; and did not advance a good correctional goal, nor a legitimate penological objective, or interest. These actions was based on retaliation for my active civil complaint against WDOC staff - Super-Pct Glebe, (Erik Jackson) whose now Superintendent at M.C.-C. Twin Rivers Unit (TRU), etc., and for my good faith participation in the WDOC / M.C.C (soc) grievance system. Hines v. Gomez; Turner v. Safeley; Wolf v. McDonell, see, Exhibits

## II. I.T.U/A-unit Retaliation, Cruel and unusual

- Treatment, deliberate indifference, Sexual Harassment, Racial DISCRIMINATION obstruction and court interference to Civil active complaint

On, 5-13-16, or about that date, I was housed and placed in cell- #103, by #6-Jones, on 5-12-16 who was racially discriminating provocative, combative, belligerant, sarcastic, rude, combative in his verbal and/or challenging, irate, misconduct and punitive, unsanitary, cruel and unusual treatment towards me, beginning from my initial placement into A-unit / I.T.U (soc). As he first, was frenetic about me undressing and being stripped searched in the Tier- #1 holding intake cell, ordering me to move faster than

(S)

I was able to, and when I tried to explain about my physical disabilities, he refused to listen to any sort or reasoning, then stated; He was leaving me in the holding cell until he felt like returning, so I could be placed in my cell. When he and a assisting § 87(2)(b) placed me in cell #108, it was repugnant, unsanitary, with Fecies, blood, spit, snot, and moldy food, everywhere, on the walls, floors, bed area, table, the walls were corroded, rusted, in the window frame; etc., bugs/insects were crawling and flying all over the floors, walls, bedding area. I tried to take a shower, and my neighbor's toilet (cell #108) would flush Fecies, urine, etc., up into the shower drain, and got on my feet, all over the floor, shower/toilet area, flooding the cell floor, which I explained these issues to the booth officers, § 87(2)(b) Jones, Sgt. Laughlin, then was forced to file 2013 emergency grievances, to be finally moved, after the first, First Shift Lieutenant-Katrina Jackson, mental health A-unit Counselor-Kate Bright refused to address the exigent issue, nor move me out of that cell #108. They both told me to either clean it up or live with the Fecies, urine, etc., all over the floor, and that it was my job/responsibility to clean up other inmates bio hazard waste, etc.. Then, I was subsequently moved during First Shift to another repugnant, unsanitary cell #101, where it had strong urine smell all over the cell, door, with stopped up/clogged drains of the sink, and just like cell #108 drains and toilet was clogged. There was blood, snot, spit, Fecies & mucus, food crusted and moldy, bugs crawling on the floor, all around and in the bedding area, window seal inside, and at one point, while I slept, I was awoken with fright, from the pestilence (bug) crawling into my right ear, and stopped it, half way in-

Side my ear, then it bit me, which I later showed medical staff - P.A. Shirley and P.A. Keith, my inside ear area where the open sore existed. I also complained to them both on different occasions, my eye, lung, chest, stomach, etc., infections, pains, I was experiencing, and still am experiencing. However, none of my ailments was treated, nor was my cell room conditions remedied, which I also apprised certain other staff of the punitive treatment I was being subjected too, like, Sgt.-Laughlin, C.U.S.-Jason Neely, Mental Health counselor's of A-unit - K. Bright, ms. Kristen, Dr. Abghari, Classification Counselor-Aaron Heineman, #6-Sones, #6-Benton, #6-Blackman, #6-Stringham, #6-Johnson, #6-Markberry-who placed me in that repugnant cell #101. None these staff corrected this issue, or any other problems I was subjected to, while housed in A-unit (I.T.U) 23-hour and most of the time 24-hour lock down. In fact, subsequently, A-unit staff, including #6-Lance Rogers who continued to be allowed to come to A-unit/ Tier #1, to my cell front #101, and when I was placed initially in A-unit on 5-12-16, which Sgt.-Packwood was with #6-Rogers on that date, and signed my chart clipboard, as he and #6-L. Rogers laughed, taunting me, making mockery of the fact I was placed in the I.T.U/A-unit. As #6-L. Rogers continued to show up to my cell repeatedly, after he wrote that false infraction (663-wac rule violation) on 5-9-16, Alleging he was "intimidated by me, for asking his supervisor's could they address his behavior of racial discrimination, harassment, provocation," etc.. Then, my request for my legal property to be provided to me, was denied, deliberately, by A-unit Staff - C.U.S-5. Neely, Sgt.-Laughlin, and the Legal Librarian - ? of (SOU) as well, who also denied

my request for legal supplies, except for a few manila legal envelopes, and finally a few sheets of lined paper, just a few days before my transfer. Even after I explained, via Kites and oral advice to Sgt.-Laughlin, C.A.S.-J. Neely, legal Librarian-?, property officer of (SOU), F-unit Sgt.-Clayton, Super.-Dan White, Mental Health staff of A and F-units Dr. Abghari, Dr. Brown, Kate Bright, ms. Kristen, 2nd and 3rd Shift staff of A-unit. However, they all failed to provide me with my legal property and legal supplies as needed. I was also sexually harassed by Co-Jones, and treated with egregious harassment, legal incoming obstructions, and outgoing obstructions by 1st, 2nd, and 3rd Shift A-unit staff. Denied cleaning supplies, except for a 8oz cup of hepistat, and a 8oz cup of heavy duty cleaner once or twice in 30-days. The two 3rd Shift two Co-Stringham and Co-Johnson, as well as, Co-Blackmar were contaminating my cups at cup exchange, and tampering/contaminating my trays of food. Then, Co-Jones, Co-McCloud-? on 2nd Shift, continued to harass me, awaking me with freight, banging on my cuff-port door, with their metal keys, whenever they would open my cuff-port, stamping up and down the stairs and banging on the stair rails, nearist Tier #1, and my cell, as well as punching the plexiglass walls, nearist my cell, both being combative, rude, sarcastic, aggressive, racially discriminating towards me, along with 3rd Shift Co-Blackmar, Co-Johnson, and especially Co-Stringham. I Filed grievances, emergency grievances, Kites, about the malfeasance staff conduct I was subjected to by the above staff, etc., but was only subjected to more reprisal from the same staff. I apprised, Sgt.-Laughlin, casu-Jason

Neely, Lt.-Asen, who was also involved with the staff misconduct or/and was evasive and obstructive of my complaints/grievances, etc., Lt.-K. Jackson, Lt.-Richards, Lt.-Smith's, Super-Dan White, Super-Michael Oberland, etc.. On 5-16-16, I filed my Disciplinary hearing Appeal to the 663-violation with Disc.Hearing escort -Co-Bosc, who stated "it would be processed on that date," etc.. Then Counselor-Aaron Heinenman, placed me on "Ad.Seg.Custody on the date of my scheduled release from A-unit (5-18-16)." Then, he lied to my face, subsequently, at my cell-door on the date he had me sign those Classification papers, which was for his recommendation for demotion to closed custody, and transfer to WSP." As he stated, "mental health staff-Dr.Brown, Dr.Abdghari did not want you back in F-unit," etc.. Then my Appeal of "Ad.Seg.Custody," I submitted to Super.Dan White, and my Disc.Hearing Appeal of the 663-violation was sent to Twin Rivers Unit/m.-CC, to Assoc.Super.-M.Wood, whose supervisor is one of the defendants in my active civil complaint (Super.-Erik Jackson). I also submitted a Appeal of the "Classification Recommendation of custody demotion to closed custody with transfer to WSP," to iDOC Headquarters "Acting Secretary-Dick Morgan," As the recommendation was submitted by the Facility Risk Management Team(FRMt)-"Counselor-Aaron Heinenman, C.I.U.S.-Jason Neely, Sgt.-Clayton, Mental Health-Dr. Tony L. Browne, Mental Health-Dr.Henry H. Abdghari, Programing Supervisor/A.-D.A. Coordinator-Kathryn M. Grey, Lisa Anderson who asked that I be "transferred to WSP mental health(BAR) units for mental health treatment," and Ad.Seg.Custody classification

Officer-Harold P. Archibald, who also was rambunctiously aggressive, taunting and provoking verbal confrontations with me, yelling and ranting and raving, as he tried to force me to engage in his temper trade misfeasance behavior, prior to this "5-24-16, teleconference hearing held with WDOC Headquarters mental health staff and "Timothy C. Chase" which (sou) M.C.C above (FRmt) staff made their "concurring" decisions to demote me to closed custody and transfer me to WSP, on "5-26-16." yet, I received nothing indicating what was their decisions, as well as WDOC Headquarters staff -? Then, "Timothy C. Chase" agreed with the recommendation to demote me to closed custody, and transfer me back into another peril predicament, at "(WSP)". which was on 6-7-16. Then, I spoke with Dr. Browne, who never explained what was the plans for me, or why I was being held in A-unit, and held to higher standards than other (sou) M.C.C Inmates, who received infractions and committed acts more egregious than what allegations I received and were found guilty by Disc. Hear. Off.-S. Ewing, various prior times before and during my stay in A-unit/I.T.U. who also stated, "your being held to higher standards than us Slaughter," etc., and "their willing to be my witnesses." Then, I also spoke to Dr. Heineman, and he stated, "he never said he did not want me back in F-unit," etc., which Mr. A. Heineman lied to me saying that he did and Dr. Browne said that...\* Also, on 5-26-16, Counselor-A. Heineman, Dr. Browne, Dr. Abghari, Kathryn N. Grey, all said to me

"They were recommending me for MIS custody," and on the omni custody review report, they all lied, especially Mr. A. Heineman and Kathryn M. Grey. They also, failed to state; my explicit repeated statements, "Do not send me back into WSP Facility." However, none of the staff listened to my request. Or, maybe they did. Which is why I was then, lied to by Dr. Abghari, Dr. T.L. Browne, Aaron Heineman, Kathryn M. Grey, that "they were making sure all my property (6) boxes, and my Sony Radio/C.D/Cassette player was going to be placed on the chain bus with me, whenever I was being transferred. However, on "6-13-16", Go-went came to me in the morning with a tall male caucasian 90-?, ordered me to get dressed, you're going on the chain bus." I stated, "why didn't anyone tell me, so I could pack my legal and personal property, that was in my cell? He couldn't give me an answer. Then Sgt. Laughlin, came, made threats of causing me bodily harm if I didn't go on the chain-bus, after I asked her Where am I going? She, nor Go-went would tell me. I then asked about taking my chain bag on the chain bus? Go-went lied, saying, "yeah, it will go," etc. Then I exited my cell then he left it on my cell room #101 floor, and when I was being ankle cuff, Go-went lied again saying, "He will grab it after I was ankle cuffed." Then he ordered the assisting 90-? to "take my phone book out of my soxs." Then he lied again as he left my chain bag inside my cell -#101 "I'll go back and grab your chain bag, so it will go on the chain bus." Then as I passed C.U.S - Jason Neely, I asked for his intervention, concerning my "chain bag"; to make sure

transferred back into a peril situation at WSP with their staff there, etc.. He stated, "He would help me as best as he could, and will call me into his office", etc.. I explained, "I need the transfer order to be stopped before I'm transferred there". He said, "He would make some calls, to see what could be done", etc.. Then, I asked about my legal property, chain bag, phone book? from the intake 40-? and explained to all staff there "I have a court deadline, of 7-18-16." I stated the same to R-3 staff after I was placed in cell-G #10, with a inmate that was S.G. I also explained to 2nd, 3rd, and 1st shift staff, and sent Kites to legal Librarian John Thompson, W.C.C property room sgt.?, C.U.S-Deen of R-3, "I have court deadline, I need my legal property, chain bag, and phone. And I'm being placed in a peril predicament if I'm transferred back to WSP, because of the staff, there", etc.. Sgt.-Subida, Sgt.-Leeves, S.G Smith, C.U.S-Deen, stated; they would do what they could to stop the transfer. However, on 6-15-16, I was threatened again with assaultive behavior, this time by Sgt. Koppa, whom I had prior experiences of harassment from, in my prior stay in W.C.C / I.m.u - He and 40's custody staff came to my cell, like a angry white lynch mob, at 4:30 or 5 A.m in the morning, being loud, "Slaughter, wake up, its time to go", etc.. This was after I filed an emergency grievance with 1st shift R-3 staff, prior to them coming to my cell which was around 12:Am? 6-15-16. Then, I was cuffed with my hands behind my back. When I inquired why I was being treated this way? Sgt. Koppa was

angry, belligerent, rude, and stated, "we got information you were going to refuse to go on the chain bus," after he was constantly flashing his flash light, in my eyes directly, as I was getting dressed, and placing my shoes on. I asked him to stop flashing his light in my eyes, but he refused, lying, saying, "I'm not doing that." Then as the one German male #0-? was ordered to cuff me, by Sgt.-Koppa, I tried to hand them my copy of the emergency grievance I filed earlier, to stop my transfer to WSP, which Sgt.-Sabia told me that's where I was being transferred to, on 6-14-16. However, that officer refused to take that grievance and place it in my chain-bag; w.c.c. Sgt.-Reeves gave me on 6-14-16, and 1st shift, staff stated, "I could take that grievance on the chain bus, just ask the officers to place it in your chain bag," etc., when they came to get me for the chain-bus. Then that #0-? took that grievance out of my hand and dropped it on the ground in front of my cell G-#10. Then I was placed in the truck, transported to the Intake unit, placed in another cage, then Sgt.-Klaus, removed me out of the cage, into General population area and I was placed on the chain-bus for WSP. Then placed back into a peril position at WSP, which violates my 1st, 4th, 5th, 8th, 14th Amendment rights to the U.S. Constitutional laws. And all the above (SOU) M.C.C. Staff's misconduct, malfeasance, nefarious behavior was intentional, punitive, malevolent, malicious and ill-willed, Court interference, deliberately indifferent to my needs, especially medical needs.

They acted under W.D.O.C rules and regulations, without any correctional goals, legitimate penological interest, objectives, and I had a liberty interest, and my conduct was protected, when I received this primitive, emotional distressful, egregious conduct. Their behavior did not advance any legitimate purpose, or goals. I believe it was retaliatory, based upon information and belief, I was receiving this infraction, to place me in punitive confinement, then be demoted and transferred back to WSP, because of my Civil suit and grievances I filed against W.D.O.C staff - Erick Jackson," "Super.- Dan White," "Super.- Michael Oberland," "Super.- Pat Glebe, Super.- Jeff Utecht, Lt.- Aisen, GO-Lance Rogers, Lt.-Richards, GO-Kumar, GO-De mayo, Sgt.-Ayala, Sgt.-Packwood, Sgt.-Laughlin, Lt.-K. Jackson, Counselor Aaron Heineman, Assoc. Super.- Jack Warner, who both placed me on Ad. Seg. Custody Retainment in A-unit, Cus.- Jason Neely, GO-Jones, GO-Blackmar, GO-Johnson, GO-Stringham, Bernard Warner, Assoc. Super.- Bailey, etc.. See, Exhibits - A - Z, Lewis v. Casey; Casey v. Lewis; Hines v. Gomez, Bounds v. Smith; Pratt v. Rowland, 65 F.3d 882, 886 (9th Cir. 1995); Wilson v. Seiter, 501 U.S. 299, 311 S.Ct. 2321, 2326, 115 L.Ed.2d 271 (1991); Wolff v. McDonnell; Hewitt v. Helm; Turner v. Safley; Farmer v. Brennan, 511 U.S. 825, 837, 114 S.Ct. 1970, 128 L.Ed.2d 833 (1994); Edwards v. Balisok, 520 U.S. 641 (1997); Brown v. Plaut, 131 F.3d 163 (D.C. Cir. 1997); Seney v. Giltner, 197 F.3d 578 (2nd Cir. 1999); Allah v. Silverling, 229 F.3d 220 (3rd Cir. 2000); Vitek v. Jones, 445 U.S. 480 (1980). And is has caused/ Causing me pain and suffering...\*

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### III. EXAUSTION OF REMEDIES

1. Since my first grievance filed, during April, 2016 against (sou) M.C.C. Staff, %o-Kumar, %o-De Mayo, %o-Lance Rogers, Lt.-Richards, Lt.-Asens, and Kites, I received retaliation for exercising that right, and then was placed in punitive confinement, based on a false report/embellished spurious, and hyperbolic written report, Infraction (663-wac rule) %o-Lance Rogers and Brittany West wrote on 5-9-16. Apparently, every time I write a grievance I am subjected to reprisal, punitive, harassing, sexual harassing, verbal assaultive, etc.. Treatment from the Staff or/and their coworkers, then when I submit Kites, to the Super-Dan White, Super-Michael Oberland, I received more reprisal, not to mention biased, reprisal, Disciplinary Hearing and Disciplinary Hearing Appeal, from First Disc. Hear. Officer-S. Ewing, who found me guilty of that (6-63-wac rule) based on Fictitious evidence and then I received a "Affirmed guilt" Disciplinary Hearing Appeal from "Assoc. Super-Michelle Wood" on "6-9-16", I have not received a copy of that decision, yet. which her boss/supervisor is one of the Defendants in my active civil complaint (civ-5484-Bits-JRC), "Super-Erik Jackson", which is reprisal indirectly, upon information and belief. Also, Super-Erik Jackson was responsible, along with another officer, etc., who wrote false infraction reports and then just in this above case, "placed me on Ad-seg. custody in I.m.u/F-unit" at S.C.C.C., "pending suitability housing placement,

and prohibited placement pending Transfer," which just like in this present case, Super.-Eric Jackson had me transferred to C.R.C.C, in hopes of me receiving more retaliatory infraction or/and peril treatment of physical harm, or worse. Now, the same nefarious issue is happening again. This malfeasance misconduct continues despite all the grievances, tort-claims, Letters, Kites that I File/Filed, because just as the grievance coordinators at prior facilities has subjected me to, then, like at, C.R.C.C-Griev.Coordr-J.L.Fleaitt; USP-Griev.Coordr-Lee Young and Lori Scamahorn; C.B.C.C-Griev.Coordr-Michael Hatthe; S.C.C.C.-Griev.Coordr-Dahne and Kerri Mc Tasney, they all in cahoots with their coworkers at those facilities, at that time, then send e-mails, and make phone calls about me to each other/facility staff. Then, impede, disquoute, procrastinate, my grievance in the grievances, then refused to process them, telling me to superfluously "re-write the grievances"; or/and, break it down into 4 or 5 issues; so I can only File(s) grievances, then the same staff can continue along with their coworkers to subject me to more reprisal, etc.. Which is what happen in this above complaint; the (SOU) M.C.C Grievance Coordinator-Lee Sempler, used the same tactics to stop my grievances from being processed, then claimed I "have 6 active grievances" but none of them were processed at level-1-3. When I appealed the decisions of Lee Sempler, just like with the other above prior grievance coordinators, at prior facilities, the Grievance Program Managers-Deven Schrum, and in this above case G.P.M-Dale Caldwell, "denies all my grievance appeals".

which neither of their malfeasance actions advanced a neutral governmental interest, legitimate penological goal/objective; and their actions were malicious ill-willed, punitive, intentional, and chilled the Constitution and the senses. My rights were protected as were my conduct, under the 1st, 4th, 5th, 8th, and 14th Amendments to the U.S. Constitution, at all times. The above defendants acted under WDOC policies and regulations. I had a liberty interest, and the defendants actions were cruel and unusual, retaliatory, deliberately indifferent to my needs and rights. See, Exhibits - A-2. Turner v. Safley, 482 U.S. 78 (1987); Abu Jamal v. Price, 154 F.3d 128 (3rd Cir. 1998); Jordan v. Pugh, 504 F.Supp. 2d 1109 (D.C. 2007); Castle v. Clymer, 15 F.Supp. 2d 690 (E.D.Pa. 1998); Casey v. Lewis; Hines v. Gomez; Ex parte Hull, 312 U.S. 546 (1941); Lewis v. Casey, 518 U.S. 343 (1996); Cleggett v. Pate, 229 F. Supp. 318 (N.D. Ill. 1964); Thaddeus-X v. Blatter, 175 F.3d 378 (6th Cir. 1999); Calhoun v. Hargone, 312 F.3d 730 (5th Cir. 2002); Jones v. Brock, 549 U.S. 199 (2001); Porter v. Nussle, 534 U.S. 516 (2002); Booth v. Churner, 532 U.S. 731 (2001); Pratt v. Roland, 65 F.3d 802, 806 (9th Cir. 1995).

\* IV. Under(Knowledge & Acquiescence) the Secretary of W. DOC, is Dick Morgan, whom I submitted my "Classification App. Recommendation of demotion to closed custody, with transfer to WSP." However, he failed to respond and to provide me with protection from being transferred back into WSP, which implicates his actions too, in this above civil complaint, and makes him directly involved.

**V. Relief**

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

*All*  
That my Property, Sony C.D/cassette/Radio player returned to me, with my chain bag, and phone book, immediately, and that I receive a new Disciplinary Hearing, and that I be transferred, back to M.E.C, or, C.B.C., C., or S.C.C., immediately. That I be compensated for detriment and irreparable damage, punitive treatment, \$1,600.00, plus attorney fees, filing fees, legal cost and fees incurred from this case. That video bubble camera's be placed in all the (SOW) buildings in and outside of them, etc.. Replace the old cameras with bubble new cameras, and transfer me out of WSP immediately; Also, that I be allowed to file a 1st Amended complaint?

Thank you,  
Please!

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 28<sup>th</sup> day of JUNE 2016.

Ossie L. Slaughter

(Signature of Plaintiff)

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